

1 Q My question is a little bit different, and perhaps
2 if I show you this document. It's a letter that bears the
3 date of December 19, 2001, and then there are some materials
4 that are attached to that, and why don't we go off the
5 record while you look at this.

6 (Discussion held off the record.)

7 BY MR. SHOOK:

8 Q So what you've looked at is the December 19, 2001,
9 letter from Mr. Colby to the commission and there were a
10 number of other materials that were related to that. One is
11 a letter from the commission that is dated June 21, 2001,
12 and then there is an FCC remittance advice and it's dated
13 December 19, 2001. Then there's a copy of a check for \$135
14 made payable to the FCC, and the question that I have that
15 is connected with the documents that you've just looked at
16 is, what understanding do you have as to the authority that
17 WSTX-FM has for it's current operations?

18 A Okay, just briefly glancing over the letters
19 there, our FM station applied for permission to operate on
20 Recovery Hill and they were saying that it was going to
21 interfere with the transmission of planes coming in and out
22 of St. Croix. I recall that completely.

23 Q Okay.

24 A Okay.

25 Q And what resolution, if any, has there been to

1 that?

2 A There has been, as a matter of fact, I think they
3 have even, they're moving their site there now.

4 Q Who's moving the site?

5 A The people for the tower, they're using something.
6 However, I would like to point out here.

7 Q Okay. Wait a second. Who is moving what tower?

8 A Okay. There was a tower already up there where
9 the radio station and television station used to operate,
10 and higher up about the distance from here as those trees,
11 let's say to the top of that building that we can see the
12 tower up there, the top of the building, looking straight
13 across there. That thing must have blocked you. You can't
14 see the tower, I can see the tower from here.

15 Q I can see the tower.

16 A You see the tower?

17 Q Yes.

18 A Okay, well, about this distance apart is the FCC,
19 not the FCC, but the group at the airport. They have a
20 tower up there and they were figuring that if our FM goes up
21 there we're going to interfere with it. I pointed out to
22 property and procurement that we should not run into any
23 interference and they took, they -- We were going to
24 utilize the same area where the television station was using
25 once, it's Channel 2, was using that station, that area.

1 They're now moved and they've gone into Sunny Isle Shopping
2 Center and they use back again the same Blue Mountain where
3 they transmit up to the mountain side and that's where they
4 do all their work.

5 However, I was told by the property and
6 procurement that everything would be all right and that we
7 would be able to utilize that site. However, in the
8 meantime there's a gentleman named, Mr. Prosser, and he
9 operates a number of telephone things and they have a slew
10 of telephone towers upon the same hill that we were going to
11 ask to use, but they are using it right now, but they are
12 not using the area that we were asking for, which is where
13 the tower is of the old television station. That is still
14 not being used, but getting back to this document and that
15 document is what we were asking for, and in the other
16 document that I read there --

17 Q Which document? You're going to have to say which
18 one as we were pointing it out here.

19 A In this one is which we suppose, and we --

20 Q So the December letter from Mr. Colby.

21 A Yes, about the use of the hill and they said that
22 there was some interference.

23 Q Right. The FCC had said to use it, or to Family
24 that there was a problem.

25 A Yes, I understood they said there was a problem,

1 and then -- But I would like to point out to you, sir, that
2 the latest information that I received from property and
3 procurement who's responsible for that area, they're saying
4 now that we would be able to utilize that space, but they
5 haven't given us the full okay yet. Did I make myself
6 clear?

7 Q Probably not, but we may have to live with that.
8 If I can't think of any way of --

9 A Now, then tell me. Ask me the question so I can
10 answer.

11 Q Well, that's the thing. I have to think of a way
12 to ask you the questions in order to --

13 MR. COLBY: I could answer your questions by you
14 particularly, Mr. Shook, but I don't think you want me to.
15 I think you want to illustrate the fact that this witness
16 knows absolutely nothing about what he's talking.

17 MR. SHOOK: Well, or that he knows quite a bit.
18 It's --

19 MR. COLBY: But it's inaccurate.

20 THE WITNESS: The information I know is what was
21 revealed to me by an individual from property and
22 procurement who is reason there is, the first thing, the
23 area is owned by the Government of the Virgin Islands, and
24 when it comes to properties, property and procurement is
25 responsible for it.

1 BY MR. SHOOK:

2 Q When did you have this conversation with the
3 individual that you're speaking of for property and
4 procurement?

5 A I had up to last month.

6 Q Up to last month. So if something transpired
7 since --

8 A I don't have anything transpired at all.

9 Q -- that conversation, you wouldn't know of it.

10 A I wouldn't know.

11 Q I'm going to show you what appears to be a stock
12 certificate. It appears to be stock certificate number four
13 and it is to an individual names Thomas John-Hope, and the
14 number of shares that appears that Mr. Thomas John-Hope has
15 is 60.

16 A Yes.

17 Q Take a look at this document and then I'm going to
18 ask you a question about it.

19 A I'm familiar with this. This is my signature.
20 I'm familiar with that.

21 Q Okay. So the signature that appears above the
22 name or the title president is your signature?

23 A G. Luz A. James, that's me.

24 Q And there's another signature that appears. Do
25 you know whose signature that is?

1 A This was my secretary, Leonile A. Sealey.

2 Q Your secretary at the law office?

3 A At that time, yes.

4 Q Is she still your secretary?

5 A No. I mentioned earlier I don't have a secretary
6 right now, sir.

7 Q When did she cease being your secretary?

8 A She stopped being my secretary when I started
9 getting ill from 1995.

10 Q Now do you know what it is that Mr. Thomas John-
11 Hope paid for 60 shares of Family?

12 A Okay, he bought shares in the -- I got on the
13 radio and I told the people I was going to sell shares.
14 Okay? And he came in and he bought those shares, and
15 thereafter Mr. John-Hope said he wanted his money back. So
16 I paid him his money back and I paid on that.

17 Q Okay. Well, one thing at a time. In terms of Mr.
18 Thomas John-Hope buying shares of Family, do you recall what
19 it was that he paid for those shares?

20 A Okay. We were selling shares and we sold about, I
21 dare say, about \$20,000 worth of shares, he alone had
22 \$10,000 shares.

23 Q Are you saying that the 60 shares that he bought
24 that's reflected on this certificate came out to around
25 \$10,000?

1 A Yes, sir.

2 Q So, let's see, if the math on that would be, it
3 would be about \$166 a share?

4 A For 60 shares?

5 Q Well, if he paid in, if he paid \$10,000 for 60
6 shares that roughly comes to \$166 a share.

7 A Whatever your mathematics show you, sir, then I
8 can assure you that he paid me close to \$10,000, and he was
9 refunded every single penny.

10 Q So there was a time when Family Broadcasting, Inc.
11 redeemed the shares and bought them back from Mr. Thomas
12 John-Hope?

13 A Yes, sir.

14 Q Do you recall approximately when that took place?

15 A I think he purchased these shares and shortly
16 thereafter he said he wanted his money back.

17 Q So approximately within a year after?

18 A I would say within a year.

19 Q So according to this document Mr. Thomas John-Hope
20 was issued 60 shares of stock on November 19, 1992.

21 A Yes.

22 Q And what you're saying is that approximately a
23 year later Family Broadcasting, Inc. refunded?

24 A Every cent on, we paid him back.

25 Q Would there be a bank record some place that would

1 reflect that?

2 A I usually have receipts or when I pay monies out I
3 go to the Bank of Nova Scotia or the bank, First
4 Pennsylvania, and I would get cashier's check or money order
5 and I would have that, but now to go and find that, gee, I
6 got to dig on that to find that, but he has been paid. If
7 you doubt me you can come to St. Croix --

8 Q I would love to come to St. Croix.

9 A -- and I will take you to him, and you will ask
10 him whether he has been refunded his money, and he'll tell
11 you, yes, he's been paid. When we marked paid on this, when
12 he was refunded, I failed to mark the date on it, when he
13 was paid. I should have done that on the side.

14 Q So are you saying that the paid marking here
15 represents that this was stock that was redeemed and that --

16 A Refunded, yes he was.

17 Q -- money was refunded?

18 A Yes, sir, he was refunded.

19 Q All right. I mean, I have to tell you that
20 ordinarily when I see a certificate like this it's telling
21 me that the individual paid for the shares as opposed to
22 perhaps owing money on it.

23 A No, he was refunded every single penny, \$10,000.

24 Q And your recollection would be that this was done
25 by way of a cashier's check or a bank check of some kind.

1 A Cashier's check. Yes, sir.

2 Q Now the next document also bears a date, well, no.
3 It bears a different date. Excuse me. It bears a date
4 of --

5 A Yes, he paid in different times.

6 Q Actually, there are two dates that appear. One is
7 a typed date, it appears to be September 7, 1993, and then
8 there's a handwritten date above that and that appears to be
9 August, it looks like third, 1993, do you see that?

10 A Yes. First it said September 1, 1993, then August
11 3rd, and I made a correction here because this was -- That's
12 my initials here.

13 Q So that handwriting, the date that appears here is
14 something you hand wrote in?

15 A That's correct, sir.

16 Q And so, once again, the signature that appears
17 above the title president is yours?

18 A Over here, yes, that's my signature, and that's my
19 secretary, Leonile A. Sealey.

20 Q And, Julie John-Hope, who is that?

21 A That's the same fellow's daughter.

22 Q That's Thomas John-Hope's daughter?

23 A Thomas John-Hope's daughter, that's correct.

24 Q And according to this document, Julie John-Hope,
25 bought 40 shares of Family Broadcasting, Inc.? Is that your

1 understanding of what this document represents?

2 A Yes, sir.

3 Q And did Julie John-Hope pay for the shares of
4 stock or did somebody else pay on her behalf?

5 A John-Hope paid for all of them and he put it in
6 different persons name, members of his family.

7 Q You mean Thomas John-Hope?

8 A Thomas John-Hope. He bought the shares and put it
9 in his name, his wife's name, his daughter's name. That's
10 what he did.

11 Q The share of stock that are represented on the
12 certificate that went to Julie John-Hope, does she currently
13 own any shares in Family?

14 A None now. They were refunded \$10,000. The whole
15 thing came out to \$10,000, all the shares, sir.

16 Q All the shares. All right. So I was operating
17 under a mis-impression then from the conversation that we
18 had before about a price per share. So the price per share,
19 the \$10,000 that you're taking about, represents not only
20 the money that Thomas John-Hope paid for his shares, but
21 also for the shares that he bought for his family members?

22 A That's correct, sir.

23 Q Now the next document I'm going to show you has it
24 for Julia John-Hope.

25 A That's his daughter.

1 Q Another daughter? The signature above the line of
2 president is yours?

3 A Yes, sir.

4 Q And according to this document Julia John-Hope had
5 40 shares of Family, purchased by her father?

6 A That's correct, sir.

7 Q And that at some point you refunded money to her
8 father?

9 A I refunded him \$10,000 for the whole thing.

10 Q So Julie John-Hope at this point owns no shares in
11 Family Broadcasting?

12 A No, none whatsoever.

13 Q Now the next document reflects issuance of shares
14 of stock --

15 A Juliette.

16 Q -- to Juliette John-Hope, and who is that?

17 A That's his daughter.

18 Q Another daughter of Thomas John-Hope?

19 A Yes.

20 Q And if I were to ask you all the other questions
21 about whether she currently owns that, she doesn't own
22 anything because --

23 A None whatsoever.

24 Q -- Family Broadcasting refunded all the money?

25 A Yes, sir.

1 Q Now you'll notice that for Thomas John-Hope the
2 first certificate there reflects the number four, for 60
3 shares. Julie John-Hope, the stock certificate is number
4 27, Julia John-Hope, the stock certificate is number 28,
5 Juliette John-Hope --

6 A That's 29.

7 Q -- it's, actually that looks like 39.

8 A Let me see something. It's 29.

9 Q Twenty-nine, okay. Now for number 30 it also
10 shows Thomas John Hope, but unlike stock certificate number
11 four this one doesn't have any hyphen between the John and
12 the Hope.

13 A John Hope?

14 Q Right.

15 A His full name is John-Hope. His name is John-
16 Hope, and the others, like Julia John-Hope should also have
17 a hyphen, and Juliette John-Hope.

18 Q So when we get to stock certificate number 30 is
19 the Thomas John Hope that appears here the same person as
20 number four, certificate number four?

21 A Same person. Yes, sir.

22 Q Now the next two pages that I am going to show you
23 appear to be on WSTX-AM and FM letterhead and I'm going to
24 ask you to take a look at this for a second. We can go off
25 the record.

1 (Discussion held off the record.)

2 MR. SHOOK: We're back on the record.

3 BY MR. SHOOK:

4 Q Could you tell us what this document represents?

5 A This document here shows those individuals who are
6 holders of, I mean, who are shareholders in that.

7 Q So there are 41 entries here.

8 A Yes.

9 Q Now each of the 41 entries are suppose to
10 represent a person or persons --

11 A Or person.

12 Q -- who own --

13 A Shares.

14 Q -- shares in Family Broadcasting, Inc?

15 A That is correct. Yes, sir.

16 Q Who currently own shares?

17 A Yes, sir. You'll see my son's name down there.

18 Q Next to number 33, Senator Gerard Luz A. James,
19 II, that is your son?

20 A That's my son.

21 Q And do you know how it is he came to own a
22 thousand shares?

23 A He bought a thousand shares.

24 Q Do you know when he bought those thousand shares.

25 A If you see his name here, it had to be after these

1 individuals bought that.

2 Q Oh, the order of individuals is roughly
3 chronological in terms of when they purchased the stock?

4 A Yes, sir, when they purchased the shares. We
5 have, there's a book that we have, with everybody's name in
6 it who purchased shares.

7 Q Where is that book?

8 A That book? I'll have to look for it. It should
9 be at home. I have it in the Virgin Islands.

10 Q Do you know who prepared this particular document?

11 A I dare say, that must have been prepared by my
12 daughter, Barbara.

13 Q Have you ever seen this document before today?

14 A I'm seeing it now, sir.

15 Q You're seeing it for the first time? Do you have
16 any --

17 A I know I turned the book over to her.

18 Q You turned some materials over to her from which
19 she derived this information?

20 A She derived that. Yes, sir.

21 Q To your knowledge --

22 MR. COLBY: I believe we exchanged also in
23 discovery.

24 MR. SHOOK: Right. I'm going to get to that. I
25 hope.

1 BY MR. SHOOK:

2 Q To your knowledge is the information that appears
3 on these two pages accurate?

4 A Yes, sir.

5 Q None of these individuals so far as you know has
6 been refunded money by Family Broadcasting, Inc. for the
7 shares of stock?

8 A Let me see. Do you see John-Hope's name on this?
9 There is a lady who had paid us \$50, I don't recall her name
10 off hand, but she was refunded her \$50.

11 BY MR. SHOOK:

12 Q Well, if this list is supposed to represent
13 current shareholders of Family Broadcasting, Inc., in all
14 likelihood that person's name does not appear here, the one
15 you're referring to who was refunded that --

16 A No, I don't recall because it was recently, it was
17 recently that that took place.

18 Q I believe I'm going to find that letter and then I
19 can show you in combination with document.

20 A You have a copy of the letter?

21 Q I think I do.

22 MR. COLBY: We're showing here on this motion
23 Catherine Henry.

24 MR. SHOOK: Oh, that's the name I was searching
25 for.

1 BY MR. SHOOK:

2 Q Does that name mean anything to you?

3 A Who?

4 Q Catherine Henry?

5 A Catherine Henry.

6 Q She was the person who was refunded money?

7 MR. COLBY: Where?

8 THE WITNESS: Fifty dollars. Is it \$50?

9 MR. COLBY: Fifty dollars.

10 THE WITNESS: Fifteen?

11 MR. COLBY: No. Wait a minute, \$250.

12 THE WITNESS: Two-hundred and fifty dollars? Let
13 me see it.

14 BY MR. SHOOK:

15 Q Now just so the record is clear, could you state
16 for the record what it is that you're looking at right now?

17 A I am looking at a document here for Catherine
18 Henry, she has \$250.

19 Q And there's a document that preceded that. It
20 appears to be a copy of a stock certificate.

21 A Yes, it's Catherine Henry, stock certificate, but
22 I was looking here to see that --

23 Q Now does the stock certificate have a number?

24 A Yes, ten.

25 Q Number ten?

1 A It looks that way to me.

2 Q Well, it's a little smudged, but it appears to be
3 number ten?

4 A Yes.

5 Q And in terms of the number of shares that she had,
6 the stock certificate reflects --

7 A Five.

8 Q Five?

9 A Yes.

10 Q And issued to her on or about February 10, 1994?

11 A February 10, 1994, that's correct, sir.

12 Q The signature above the line of president is
13 yours?

14 A Here's mine and here's my secretary, again.

15 Q Leonile Sealey?

16 A Leonile Sealey. That's correct, sir.

17 Q The \$250 that was paid to Catherine Henry for her
18 five shares of stock, was that supposed to be a full refund
19 to --

20 A Full refund.

21 Q And does that represent, in other words, she paid
22 \$250 for her five shares?

23 A And she got it back.

24 Q And she got it back. Now the next document that
25 I'm showing you in four pages in length, and it appears

1 under the heading Shares Family Broadcasting, Inc., and what
2 we have are numbers, names, addresses and amounts, and the
3 first thing I'd like you to do is to tell me, if you can,
4 whose handwriting that is?

5 A Well, I know it's not my handwriting because I
6 write very large.

7 Q Do you have any knowledge as to whose handwriting
8 this is?

9 A No, I do not, sir.

10 Q Do you have any knowledge --

11 A I don't know if it could be Mrs. Sealey.

12 Q We don't need to speculate if you don't know,
13 that's fine.

14 A That's what I'm saying.

15 Q Do you have any knowledge as to how this document
16 came to be prepared?

17 A No, sir. What I will take the liberty of saying
18 this, that I know my secretary, Mrs. Sealey, she would keep
19 a running document of somebody purchasing shares, we fill
20 out the shares, I sign it, she sign it, and then she'll keep
21 a sheet like that.

22 Q The first name that appears on the list is Esther
23 Larson.

24 A Esther Larson.

25 Q Do you know who that person is?

1 A I knew her. She's now deceased.

2 Q Now deceased?

3 A Yes, sir.

4 Q Do you know what happened with her eight shares?

5 A Her eight shares has to go to her next of kin.

6 Q The next name that appears is Ada Acoy, it looks
7 like A-C-O-Y.

8 A Acoy, yes. She's alive.

9 Q So far as you know she still owns four shares
10 of --

11 A Yes, sir.

12 Q The next name is Lula Parris?

13 A Yes, Lula Parris.

14 Q Do you know who she is?

15 A I know her very well.

16 Q So far as you know she still owns four shares of
17 Family?

18 A Yes, sir.

19 Q Now the next name is a name that I think we've
20 talked about some, it's number four.

21 A John-Hope.

22 Q Thomas John-Hope.

23 A Yes.

24 Q And there's an indication of 60, but then there's
25 an asterisk after the number 60 and all of the information

1 pertaining to him has been sort of enclosed in a squiggly
2 oval-like.

3 A Right here. He has been repaid, he has been paid
4 for the shares, and I might of, I'm certain I'm the one who
5 did that, put a circle around his name.

6 Q Now a far as that goes and we go to numbers 27,
7 28, 29 and 30.

8 A These are John-Hope people.

9 Q These are all the people that we had talked about
10 before --

11 A Yes, John-Hope.

12 Q -- whose shares have been refunded?

13 A Yes, sir.

14 Q And that the line or like box, if you will, that
15 encloses --

16 A That box, they were all boxed in.

17 Q Was that something that you did?

18 A I did that. Can I say the list, my secretary,
19 would keep a list of names when the shares are sold and when
20 I refunded him I just boxed the name in there and boxed the
21 others. I did the boxing in.

22 Q Now is there supposed to be a correlation so far
23 as you know between the number, one, two, three, et cetera,
24 that appears under NO. with it being underlined, and the
25 number that appears on the stock certificate that was issued

1 to these individuals?

2 A Yes. There should be a number with them there.

3 Q No, that's different.

4 A No. Look at John-Hope, you can --

5 Q Right. I was going onto that if I could.

6 A There is a number there.

7 Q Okay. We look at the stock certificate, Thomas
8 John-Hope, it appears to have the number four.

9 A Number four, okay, look here.

10 Q Here he appears as number four.

11 A Okay.

12 Q And then also that represents 60 shares.

13 A Yes.

14 Q And on the list it appears that he had 60 shares,
15 so.

16 A Yes, there it is over there. Okay, now turn over
17 the other one, please.

18 Q The next one we're looking at is number 27.

19 A Here it is.

20 Q And that Julie John-Hope.

21 A Julie, yes.

22 Q And sure enough on the list it appears as number
23 27.

24 A Right.

25 Q Very good. Number 28 is Julia John-Hope.

1 A Julie John-Hope.

2 Q There she is on the list as number 28. Number 29
3 is Juliette John-Hope, and on the list --

4 A Juliette John-Hope.

5 Q -- number 29. Very good. Now with respect to
6 numbers 27, 28, 29 and 30, the Julie John-Hope, Julia John-
7 Hope, Juliette John-Hope and then Thomas John-Hope, again,
8 the asterisks after the numbers plus the enclosure is your
9 record that these are people whose stock was refunded?

10 A It was refunded. They were paid back their
11 monies.

12 Q Now when we get to number 46, for Senator Gerard
13 Luz James, II, and there appears to be a thousand shares
14 there.

15 A Thousand shares.

16 Q And also in front of his name there's the
17 indication PD, that suggests that he paid for the shares?

18 A They were paid. Yes, sir.

19 Q Now do you know how much he had to pay for the
20 thousand shares?

21 A I think it was \$50 a share.

22 Q Okay. That tells me that there would have been a
23 check for around \$50,000?

24 A I don't recall his \$50,000 because we had the
25 others. How much was John-Hope, wasn't that fifty?

1 Q Well, Mr. John-Hope paid \$10,000.

2 A Who was that from?

3 MR. COLBY: He paid \$70 a share.

4 MR. SHOOK: He paid \$70 a share?

5 MR. COLBY: Seventy-one to be exact.

6 MR. SHOOK: All right. That was --

7 THE WITNESS: I think it was \$50 a share.

8 BY MR. SHOOK:

9 Q Are you aware of any records that Family
10 Broadcasting, Inc. has that shows when the payment by --

11 A Who are we talking about?

12 Q -- Senator James, was made?

13 A We should have that. Yes, sir.

14 Q Should have that, but --

15 A We should.

16 Q -- do you recall having seen it any time in the
17 recent past?

18 A Well, I'll have to check the book. I turned the
19 book over to Barbara. Didn't she give you the book?

20 MR. COLBY: No. She gave me only ledger sheets.

21 THE WITNESS: Ledger sheets, yes.

22 BY MR. SHOOK:

23 Q But your understanding from this list is that your
24 son paid however much --

25 A I know he paid money.

1 Q -- per share for the thousand shares? Do you know
2 approximately when the last time shares of stock in Family
3 were sold to anybody?

4 A That was some time in 1994, 1994 or 1995. I think
5 that was the last time.

6 Q Now according to this list --

7 A If I may just say this.

8 Q Sure.

9 A Sorry for interrupting you, but I think we started
10 that in 1993 and in 1994 then we quit.

11 Q According to the four page list that I have here,
12 your daughter Barbara does not appears as somebody who
13 bought shares of stock in Family. Do you have any --

14 A No, she did not.

15 Q So as far as you know, she did not buy any shares?

16 A She did not buy shares from that.

17 Q Do you know whether or not Family Broadcasting,
18 Inc. made a gift of shares to her?

19 A Well, when we turned the shares over my wife and I
20 we turned it over to them.

21 Q Prior to that gift by yourself and your wife.

22 A I don't recall that. Her name does not appear on
23 that list. No, sir.

24 Q Was this a list that you consulted prior to the
25 time of preparing the 1995 Ownership Report for Family?

1 A That, I say yes, sir.

2 Q Let me refresh your recollection as to what report
3 I'm talking about. So what I'm showing you is the 1995
4 Ownership Report for Family and --

5 A The document which I signed in 1994?

6 Q 1995.

7 A In 1995, where it shows here 100 percent of --

8 Q Correct.

9 A Well, that's what I'm saying, that's an error.
10 That's wrong.

11 Q So you are saying that you prepared the 1995
12 Ownership Report without reference --

13 A Without references.

14 Q -- to the four page list that shows --

15 A I'm at fault at that.

16 Q -- 55 certificates having been issued to various
17 individuals along the way.

18 A That's correct. I'm at fault at that.

19 Q In terms of the refund that went to Catherine
20 Henry which appears to have occurred --

21 MR. COLBY: It's right here in this letter.

22 MR. SHOOK: I'm looking to see.

23 MR. COLBY: I've got it right here, before I asked
24 for that note that you brought out, and you was there.

25 MR. SHOOK: Which appears to have occurred in

1 December of 2001

2 MR. COLBY: Right.

3 BY MR. SHOOK:

4 Q Do you know how it was decided that Catherine
5 Henry should receive \$250 for the five shares of stock?

6 A Again, I say, at \$50 a share the five shares would
7 be \$250.

8 Q So this is simply a matter of refunding the money
9 that she had paid in?

10 A That's right.

11 Q Did you have any say in determining whether she
12 should receive either more or less then the money she paid
13 in?

14 A Well, did she show the receipt additional to what
15 she paid in? No, I did not have it. I did not.

16 Q So the decision to pay Catherine Henry \$250 was
17 made by whom so far as you know?

18 A Well, no, she asked for her money. She asked back
19 for her money, and the radio station was not making any
20 money and the people in the Virgin Islands were aware of it
21 and even the people themselves were saying why do you give
22 the government free time, why do you give the churches such
23 a low rate. Why don't you charge the churches the same like
24 the others? It was just what I decided to do. The word of
25 God I feel I would like the word of God to be spread more,

1 as it has. I would like to say that when she was given her
2 money she said thank you. I give her money rather than not
3 come in and saying she can't get anything.

4 MR. COLBY: Mr. Shook, I'm going to want to ask
5 him three or four questions about the Ownership Report of
6 2001. Will you be finishing soon enough for me to do that
7 tonight?

8 MR. SHOOK: Yes. I'm going to be finishing soon
9 and if you can't grab that document I'll try to find it for
10 you.

11 MR. COLBY: I'll go through it and find out
12 whether there's anything.

13 MR. SHOOK: I've got some things with various
14 notes on it.

15 MR. COLBY: All right.

16 MR. SHOOK: So let me try to find that for you
17 when we're up to that point and we are almost there. Every
18 deponent who stays here --

19 THE WITNESS: I was going to say, sir, what about
20 my wife?

21 MR. HUBER: I checked on her just a little while
22 ago.

23 THE WITNESS: She's all right?

24 MR. COLBY: Still go on.

25 THE WITNESS: That's what makes her.

1 MR. HUBER: I offered to let her stay in my car,
2 but she said she'd rather stay in the lobby and there are
3 people going in and out there all the time. She's doing
4 okay. I checked her.

5 THE WITNESS: I just want to know she's all right.

6 BY MR. SHOOK:

7 Q I think we're getting to the loose ends category
8 here. I don't think I ever asked this, what is Barbara's
9 husband's name?

10 A His name is Kelvin, Kelvin Petersen.

11 Q And I know I asked you whether or not Barbara paid
12 you anything in connection with her living at your house.

13 A No.

14 Q And you said no, and my question, does Kelvin pay
15 you anything?

16 A No. He's married to my daughter.

17 Q I understand that you might find that question
18 offensive given your family values and --

19 A Yes, well.

20 Q -- I understand that there's some families --

21 A We don't.

22 Q -- that would never think of charging their
23 children --

24 A Well, I'm one of them.

25 Q -- and all I'm trying to do is just get on the

1 record what the situation is.

2 A No, sir. I will not charge any member of my
3 family to stay in my house as long as I'm alive.

4 Q Okay. So the short answer then to whether or not
5 Kelvin paid you anything in connection with living expenses
6 of Barbara and/or their children is no?

7 A No.

8 Q I'm going to show you a document that bears the
9 date of August 25, 1997, it's addressed to Family
10 Broadcasting, Inc. and it appears to have been sent by
11 Rueben Jusino, resident agent, for the Federal
12 Communications Commission.

13 A Yes, sir.

14 Q You can hold onto that because I have multiple
15 copies at the moment.

16 A Thank you.

17 Q Do you recall having received this letter on or
18 about August 25, 1997?

19 A I do remember receiving a letter like this from
20 Mr. Jusino.

21 Q Do you recall --

22 A And I remember calling, I called his office in
23 Puerto Rico, this is San Juan, right there. I called the
24 office in Puerto Rico and I -- Because he mentioned here
25 the signal from Blue Mountain in 1995 we were before the

1 Court and we changed it. This was changed with that. We
2 have the authorization to operate, sir, at the same location
3 with the AM.

4 Q Well, be that as it may, you recall receiving this
5 letter?

6 A Yes, sir.

7 Q And after receiving this letter one of the things
8 that you did was call Mr. Jusino?

9 A I called the office I didn't talk with him. I
10 spoke with his secretary. I called their attention to the
11 fact that we go permission to operate at the present site of
12 the AM with the FM.

13 Q Do you recall whether or not you ultimately
14 received an AM and FM broadcast inspection checklist with
15 the particulars that Mr. Jusino --

16 A No. When he spoke --

17 Q -- indicates that he observed?

18 A He spoke about a check list and he said, "I will
19 not detail a long list of violations. I will also, however,
20 provide an AM and FM broadcast inspection checklist with the
21 particulars that I observed in violation of your pending."
22 I have not received the checklist.

23 Q You do not recall having received the --

24 A No, sir.

25 Q -- checklist to that's referred to --